



**NISAR LAW GROUP, P.C.**

570 Lexington Avenue, 16<sup>th</sup> floor  
New York, NY 10022

Casey Wolnowski, Senior Managing Counsel  
Email: [cwolnowski@nisarlaw.com](mailto:cwolnowski@nisarlaw.com)

Direct: (646) 449-7210  
Fax: (877) 720-0514

May 19, 2020

**Via ECF**

Hon. Sarah Netburn, U.S.M.J.  
U.S. District Court (S.D.N.Y.)  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: ***Ramos v. 175<sup>th</sup> Street Laundromat, Inc., et al.***  
**Case No.: 19-cv-09545 (ALC) (SN)**

Your Honor:

This letter is respectfully submitted on behalf of Plaintiff with regard to the above-captioned matter and in light of the Court's directive during the May 12, 2020 telephone conference which ordered the parties to file a letter with it no later than May 19, 2020 alerting it as to the status of the consummation of a written settlement agreement.

To date, Plaintiff's counsel has not yet received a copy of the written settlement agreement executed by all Defendants. Notably, Defendants have been in possession of this draft settlement agreement since March 13, 2020. It is still unclear to Plaintiff whether Defendants wish to litigate this matter or settle this matter. In any event, in light of the foregoing, Plaintiff kindly requests a status conference with the Court to discuss the present state of the matter, including discovery, and to enter into an amended discovery schedule for the purposes of resuming litigation in this matter. Given all that is going on in New York City surrounding Covid-19, Plaintiff's counsel kindly asks that this conference be held telephonically.

Plaintiff and her counsel thank the Court for its attention to this matter.

Respectfully submitted,

---

Casimir Wolnowski, Esq.

cc: Jason Mizrahi (*via ECF*)  
Joshua Levin-Epstein (*via ECF*)  
*Defendants' counsel*